

UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

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| JOHNNY M. HUNT, |) | |
| |) | |
| <i>Plaintiff,</i> |) | |
| |) | No. 3:23-cv-00243 |
| v. |) | |
| |) | JUDGE RICHARDSON |
| SOUTHERN BAPTIST CONVENTION; |) | MAGISTRATE JUDGE FRENSELY |
| GUIDEPOST SOLUTIONS LLC; and |) | |
| EXECUTIVE COMMITTEE OF THE |) | JURY DEMAND |
| SOUTHERN BAPTIST CONVENTION, |) | |
| |) | |
| <i>Defendants.</i> |) | |

**THE EXECUTIVE COMMITTEE OF THE SOUTHERN BAPTIST CONVENTION'S
UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE REPLY IN FURTHER
SUPPORT OF ITS MOTION TO DISMISS**

Pursuant to Fed. R. Civ. P. 6(b)(1)(A) of the Federal Rules of Civil Procedure and Local Rule 7.01, the defendant, the Executive Committee of the Southern Baptist Convention (the "EC") moves for a 7-day extension of time to file its reply in further support of its motion dismiss. The requested extension is unopposed. As grounds for this motion, the EC states as follows:

1. On March 17, 2023, Johnny Hunt filed the Complaint against the Southern Baptist Convention (the "SBC"), Guidepost Solutions LLC ("Guidepost"), and the EC alleging claims six claims: defamation/libel (Count I); defamation/libel per se (Count II); invasion of privacy/false light (Count III); intentional infliction of emotional distress (Count IV); negligent infliction of emotional distress (Count V); and public disclosure of embarrassing private facts (Count VI). (*See generally* Doc. 1).

2. On May 4, 2023, the EC moved to dismiss the Complaint for lack of subject matter jurisdiction and for failure to state a claim. (Doc. 31). SBC and Guidepost also moved to dismiss. (Docs. 25, 29).

3. On May 16, 2023, Hunt moved for an extension of time to respond to the pending motions (Doc. 34), which this Court granted. (Doc. 36). The Court ordered Hunt to respond to the motions by June 9, 2023, with replies due by June 16, 2023. (Doc. 36).

4. On June 9, 2023, Hunt responded to the EC's motion. (*See* Docs. 39–40).

5. The EC submits that good cause exists for the requested 7-day extension due to counsel for the EC taking depositions in another matter out of town the week of June 12, 2023. Accordingly, the EC respectfully requests an additional 7-days to file its reply in further support of its motion to dismiss.

CONCLUSION

For these reasons, the EC respectfully requests that this Unopposed Motion for Extension of Time be granted and that the EC be allowed an extension of time through and including June 23, 2023, within which to file its reply in further support of its motion to dismiss. Counsel for the EC has conferred with counsel for Hunt and Hunt is unopposed to the requested relief.

Respectfully submitted,

s/ R. Brandon Bundren

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*Attorneys for the Executive Committee of the Southern
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CERTIFICATE OF SERVICE

I certify that on June 13, 2023, I electronically filed a true and correct copy of The Executive Committee of the Southern Baptist Convention's Unopposed Motion for Extension of Time to File its Reply in Further Support of its Motion to Dismiss with the Clerk of Court for the U.S. District Court Middle District of Tennessee through the Court's Electronic Case Filing System, which will automatically serve all counsel of record listed below:

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s/ R. Brandon Bundren

R. Brandon Bundren